

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**REYA C. BOYER-LIBERTO**

\*

**Plaintiff**

\*

**v.**

\* **Civil Action No. 1:12-cv-00212-JKB**

**FONTAINEBLEAU CORPORATION, et al.**

\*

**Defendants.**

\*

\* \* \* \* \*

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, Fontainebleau Corporation t/a Clarion Fontainebleau Hotel and Leonard Berger, M.D (collectively referred to as "Defendants"), by and through their undersigned counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby move for the entry of summary judgment on all claims brought by Plaintiff, Reya C. Boyer-Liberto ("Plaintiff"), in her Complaint. As more fully set forth in Defendants' Memorandum, affidavits, exhibits and deposition transcripts, there is no dispute as to any material fact and Defendants are entitled to judgment in their favor on all claims as a matter of law.

WHEREFORE, Defendants respectfully requests that this Motion be granted and that Court enter summary judgment in their favor on all claims set forth in Plaintiff's Complaint.

Respectfully submitted,

December 17, 2012

/s/

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Attorneys for Defendants,  
Fontainebleau Corporation and  
Leonard P. Berger, M.D.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of December, 2012, copies of the foregoing Defendants' Motion for Summary Judgment, Memorandum of Law in Support of Motion for Summary Judgment, Request for Hearing and Proposed Order, were served by the Court's ECF system, on Robin R. Cockey, Esq. and Laura Hay, Esq., Cockey, Brennan & Maloney, PC, 313 Lemmon Hill Lane, Salisbury, MD 21801, [rreesq@cbmlawfirm.com](mailto:rreesq@cbmlawfirm.com), counsel for Plaintiff.

/s/  
Harriet E. Cooperman